

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20104-CR-MARTINEZ

UNITED STATES OF AMERICA,

Plaintiff,

v.

FREDERICK J. BERGMANN, JR.

Defendant.

\_\_\_\_\_/

**DEFENDANT FREDERICK J. BERGMANN, JR.'S  
RESPONSE TO MOTION TO VACATE RESTITUTION  
HEARING TO ALLOW FURTHER CONSULTATION WITH VICTIM**

Defendant, FREDERICK J. BERGMANN, JR., responds to the joint motion to vacate restitution hearing to allow further consultation with the victim (ECF 690).

The government and the other defendants essentially seek a continuance of the restitution hearing currently scheduled for May 21, 2024. As noted in the motion, counsel for the government was unable to reach the undersigned, who was busy working on other matters, before filing the motion. This response is filed so that the Court has a complete record on the question of whether each of the parties agrees or not to the relief sought. Mr. Bergmann has no objection to continuing the restitution hearing and rescheduling it for a future date. Mr. Bergmann, therefore, joins in the motion along with the other defendants. We respectfully request that the hearing not be rescheduled to take place between May 27 and June 5, 2024, as the undersigned will be out of the country.

Respectfully submitted,

**BELL ROSQUETE REYES ESTEBAN, PLLC**

Henry P. Bell

999 Ponce De Leon Blvd.

Suite 810

Coral Gables, Florida 33134

Telephone: (305) 570-1610

Facsimile: (305) 570-1599

Email: [hbelle@bresq.com](mailto:hbelle@bresq.com)

***Counsel for Frederick Bergmann, Jr.***

By: s/ Henry P. Bell  
Henry P. Bell

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that, on May 18, 2024, a true and correct copy of the foregoing has been furnished electronically via CMCEF to all counsel of record.

By: S/ Henry P. Bell  
Henry P. Bell  
Fla. Bar No. 0090689